Docket No. 241333US2CONT Inventor: Koichi OTSUKI et al

## **REMARKS/ARGUMENTS**

Favorable consideration of this application as presently amended and in light of the following discussion is respectfully requested.

This application is a continuation of parent application U.S. Serial No. 09/497,168.

Claims 38-74 are pending in the present application. Claims 1-37 are canceled without prejudice and new Claims 38-74 (which are similar to Claims 1-37 from the parent application) are added by the present amendment.

New independent Claim 38 is similar to Claim 1 from the parent application but is directed to a bi-directional printing apparatus including a controller that has a printing position adjuster "that uses a bi-directional printing position adjustment value to reduce printing positional deviation arising between the forward and reverse main scanning passes." The printing position adjuster includes "a second memory configured to store a relative correction value prepared beforehand for correcting the reference correction value with respect to a bi-directional printing position deviation," which is supported in the specification at least in Figures 12 and 25 and at page 28, lines 14-27. New independent Claims 57 and 74, which are similar to Claims 20 and 37 from the parent application, respectively, include similar features.

In a non-limiting example, Figure 12 shows that in step S13 the deviation amounts  $\delta L$ ,  $\delta S$  and  $\delta M$  that are measured are used to determine relative correction values that are then stored in the PROM 43 in the printer 20. The relative correction value is the differential between the amount of deviation with respect to reference dots and the amount of deviation with respect to dots other than the reference dots (see specification at page 28, line 28 to page 29, line 7).

As an advantage, instead of relative correction values  $\Delta S$ ,  $\Delta M$ , the three deviation amounts  $\delta L$ ,  $\delta S$  and  $\delta M$  may be stored in the printer PROM 43. Thus, it does not matter as

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long as information is stored in the PROM that substantially represents the relative correction

value. It is not necessary to store relative correction values for all the other dots other than

the reference dots in the PROM 43, so long as there as at least one such value stored therein

(see specification at page 29, lines 7-13).

In contrast, none of the references cited in the parent application teach or suggest the

claimed bi-directional printing position adjustment value. Accordingly, for at least this

reason it is respectfully submitted new independent Claims 38, 57 and 74 and each of the

claims depending therefrom are allowable.

Accordingly, this application is believed to be allowable and an action on the merits is

earnestly solicited.

Respectfully submitted,

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